

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

STATE OF NEW MEXICO on the)	
Relation of State Engineer,)	
)	
Plaintiff,)	69cv07941-BB-ACE
v.)	RIO CHAMA STREAM
)	SYSTEM
)	
RAMON ARAGON, et al.)	Section 7
)	Subfile: CHRU-004-0039
Defendants.)	

**JOINT MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE CONSENT ORDERS**

COME NOW Hope Miner and Norm Vogt, Inc. (collectively, the “Parties”), by and through their attorneys, and in accordance with Rule 7.0 of the Federal Rules of Civil Procedure, and Rule 7.0 of the Administrative Order Establishing Motion Practice and Procedures for the above captioned case, move for an extension of time in which to file consent orders resolving Subfile No. CHRU-004-0039, and in support thereof, state as follows:

1. In their Joint Motion for Stay filed January 10, 2006, the Parties indicated that they had entered into settlement discussions and believed that a settlement could be reached.
2. The Special Master granted their Joint Motion for Stay on January 12, 2006, allowing the parties until March 20, 2006 to either file dispositive motions, motions *in limine* and objections to exhibits or file, with approval by counsel for the State of New Mexico, *ex rel.* State Engineer, a consent order and/or other appropriate document(s) resolving this subfile matter.
3. The Parties have reached an agreement in principle and have drafted a settlement agreement that the Parties expect will be executed.

4. The Parties have provided information to counsel for the State of New Mexico, *ex rel.* State Engineer to facilitate the drafting of consent orders resolving the dispute.

5. Counsel for the State of New Mexico, *ex rel.* State Engineer has prepared draft consent orders that are being reviewed by the Parties.

6. The Parties need an additional three weeks to finalize the settlement and the consent orders resolving the subfile.

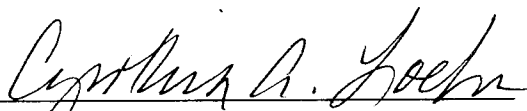
7. Special Master Vickie L. Gabin has verbally approved this extension.

8. Counsel for the State of New Mexico, *ex rel.* State Engineer supports this Joint Motion.

WHEREFORE, the Parties request the Court grant their Joint Motion and allow the Parties until April 10, 2006 to file consent orders and/or other appropriate document(s) resolving this subfile matter.

Respectfully submitted,

LEWIS and ROCA JONTZ DAWE, LLP

By: 

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and

CASSUTT, HAYS & FRIEDMAN, P.A.

Telephonically Approved – 3/21/2006

By _____
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Attorneys for Norm Vogt, Inc.

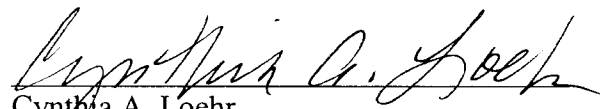
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was mailed to the following on this 21st day of March, 2006:

Vickie L. Gabin, Special Master
USDC-DCNM
PO Box 2384
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Special Assistant Attorney General
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Cynthia A. Lochr